

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**BPX PRODUCTION COMPANY,**  
**F/K/A PETROHAWK ENERGY**  
**CORPORATION,**  
**Plaintiff,**  
**v.**  
**CERTAIN UNDERWRITERS AT**  
**LLOYD'S, LONDON SUBSCRIBING**  
**TO CGL POLICY NO.**  
**ENGLO1800982 and CERTAIN**  
**UNDERWRITERS AT LLOYD'S,**  
**LONDON SUBSCRIBING TO**  
**UMBRELLA POLICY NO.**  
**ENGLO1800981,**  
**Defendants.**

**AFFIDAVIT OF AMANDA J. KUJDA**

STATE OF TEXAS §

HARRIS COUNTY §

Before me, the undersigned notary, on this day personally appeared Amanda J. Kujda, the affiant, a person whose identity is known to me. After I administered an oath, affiant testified as follows:

1. “My name is Amanda J. Kujda. I am competent to make this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.
2. I am a licensed attorney in the State of Texas and counsel of record for improperly named defendants - Certain Underwriters at Lloyd's, London Subscribing to

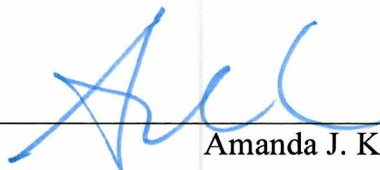
CGL Policy No. ENGLO1800982 and Certain Underwriters at Lloyd's, London Subscribing to Umbrella Policy No. ENGLO1800981 ("Underwriters").<sup>1</sup>

3. As such, I have personal knowledge of this lawsuit, including the documents attached to Improperly Named Defendants' Opposed Motion to Dismiss Under 12(b)(6) for Failure to State a Claim (Dkt. 19).

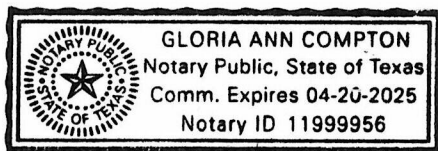
4. Attached to Improperly Named Defendants' Opposed Motion to Dismiss Under 12(b)(6) for Failure to State a Claim (Dkt. 19) are the following exhibits:


- A. Exhibit A (Dkt. 19-1): a true and correct copy of Commercial General Liabilities policy bearing unique market reference B0713ENGLO1800982.
- B. Exhibit B (Dkt. 19-2): a true and correct copy of umbrella Liabilities policy bearing unique market reference B0713ENGLO1800981.
- C. Exhibit C (Dkt. 19-3): a true and correct copy of a Master Services Agreement dated October 12, 2017 provided to Underwriters.

FURTHER AFFIANT SAYETH NOT.

  
Amanda J. Kujda

SWORN TO and SUBSCRIBED before me by Amanda J. Kujda on June 23, 2022.



  
Notary Public in and for  
the State of Texas

<sup>1</sup> Defendants are correctly named as "certain Underwriters subscribing to CGL Policy ENGLO1800982 and Umbrella Policy ENGLO1800981".